

New-Indy Catawba LLC P.O. Box 7 5300 Cureton Ferry Road Catawba, SC 29704 T 803-981-8000 New-indycb.com

April 5, 2021

Katharine K. Buckner
Sandhills Permitting Section
Bureau of Air Quality – Air Permitting Division
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Re: Title V Operating Permit TV-2440-0005 Modification Request

Incorporation of Construction Permit 2440-0005-DF

New-Indy Catawba LLC

Catawba, South Carolina 29704

Dear Ms. Buckner:

New-Indy Catawba LLC (New-Indy) has prepared this construction permit application to remove an obsolete legacy production limit related to the production of bleached paper products which are no longer manufactured at the Catawba Mill (Mill).

Introduction

New-Indy has recently converted the Mill from bleached paper grades (lightweight coated paper and market pulp) to manufacturing unbleached or brown paper (linerboard and market pulp). New-Indy refers to this investment as Project Columbia. Construction permit DF (c/p-DF) was issued for the project by the South Carolina Department of Health and Environmental Control (SCDHEC) in July 2019. The permit was updated in May 2020 to address the April 2020 addendum to the original June 2019 application.

This second addendum has been prepared to address the obsolete legacy kraft pulp production limit from c/p-DC condition 6.B.2 and TV-2440-0005 condition C.14. This second addendum does not address aspects of the project or c/p-DF that are not impacted by the obsolete kraft pulp production limit.

Project Description

The kraft pulp production is limited to 1,825 air dried tons unbleached pulp (ADTUBP) per day (12-month rolling average) in permit condition 6.B.2 of c/p-DC and condition C.14 of TV-2440-0005. This production limit is associated with producing kraft pulp suitable for manufacturing bleached paper grades at low kappa numbers (kappa 30) prior to c/p-DF (the kappa number indicates the "harshness" of the cook). Following the conversion of the Fiberline to pulp suitable for linerboard and unbleached paper grades (kappa 90) under c/p-DF, the c/p-DC production limit is now obsolete.

A summary of the production rates and emissions used for permitting c/p-DC and c/p-DF is presented in the table below:

Construction Permit ID					
Construction Permit	DC	DF	DF		
Application Date	March 2011	June 2019	April 2020		
Digester kappa before project	28	~30	~30		
Digester kappa after project	32	>90	>90		
Kraft Pulp Pro	duction (ADTUB	P/day)			
Baseline	1,532.5	1,542.9	1,520.0		
Could Have Accommodated	1,704.9	(b) (4)	(b) (4)		
Projected	1,825.0	(b) (4)	(b) (4)		
Emissions Increase from Project (tons/year)					
TSP	0.1	5.0	0.5		
PM ₁₀	0.1	1.2	(11.4)		
PM _{2.5}	0.1	(1.5)	(11.0)		
SO ₂	124.8*	(9.2)	(1,262.6)		
NO _X	15.8	(54.8)	(263.2)		
СО	24.1	(256.1)	(264.2)		
VOC	14.7	(10.8)	39.5		
TRS	1.8	8.3	6.9		
H ₂ S	< 1.8	(0.1)	2.2		
CO ₂ e	621	(55,535)	(55,428)		

^{*}PSD permit required for SO₂.

The kappa was increased slightly under c/p-DC to produce more kraft pulp suitable for manufacturing bleached coated paper grades and market pulp. The c/p-DC kraft pulp production increased approximately 120 ADTUBP/day and resulted in SO_2 emissions increasing 124.8 tons per year. The SO_2 emissions increase from c/p-DC required a Prevention of Significant Deterioration (PSD) construction permit for SO_2 that included a production limit of 1,825 ADTUBP/day as the basis of the permitted SO_2 emissions increase for that project.

The kappa was increased substantially under c/p-DF and other changes were required to produce kraft pulp suitable for unbleached linerboard grades and unbleached market pulp. Although the c/p-DF baseline kraft pulp production is nearly identical c/p-DC, the permitted production increased over (b) (4)



ADTUBP/day while the SO₂ emissions have significantly decreased. PSD construction permitting was not required for c/p-DF and kraft pulp production limits are no longer necessary.

Emissions Calculations

There are no changes to the emissions calculations presented in the June 2019 application and the April 2020 addendum to c/p-DF.

Regulatory Applicability

There are no changes to the regulatory applicability presented in the June 2019 application and the April 2020 addendum to c/p-DF.

Summary

As discussed in the June 2019 application and April 2020 addendum, there is no reasonable possibility of New-Indy having a significant emissions increase of any PSD pollutant following the conversion to unbleached paper grades. Therefore, consistent with the USEPA New Source Review Policy Memorandum dated December 7, 2017¹, no production limits are required because PSD permitting requirements are not applicable to c/p-DF. The legacy kraft pulp production limit in c/p-DC is now obsolete following the conversion to manufacturing unbleached paper grades and the reduction in SO₂ emissions. With this application we are formally requesting removal of the 1,825 ADTUBP per day production limit.

lf '	you ł	nave any	/ questions i	regarding	g this app	lication p	lease contact	me at (803) 981-8010.
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Sincerely,

Daniel Mallett Environmental Manager

¹ https://www.epa.gov/sites/production/files/2017-12/documents/nsr policy memo.12.7.17.pdf





Bureau of Air Quality

Expedited Review Request Instructions Construction Permits Page 1 of 2

APPLICATION IDENTIFICATION					
-	SC Air Permit Number (8-digits only) (Leave blank if one has never been assigned)	Request Date			
New-Indy Catawba LLC	2440 - 0005	April 5, 2021			

PRIMARY AIR PERMIT CONTACT					
Title/Position: Environmental Manager	Mr.	First Name: Dan	Last Name: Mallett		
E-mail Address: dan.mallett@new-indycb.com		Phone No.: (803) 981-8010	Cell No.: () -		

SECONDARY AIR PERMIT CONTACT				
(If the Department is unab	e to contact the primary ai	ir permit contact please provided a sec	ondary contact.)	
Title/Position:		First Name:	Last Name:	
E-mail Address:		Phone No.:	Cell No.: () -	

Check One	Permit Type	Expedited Review Days*	Fee**
\boxtimes	Minor Source Construction Permit	30	\$3,000
	Synthetic Minor Construction Permit	65	\$4,000
	Prevention of Significant Deterioration (PSD) not impacting a Class I Area (no Class I modeling required)	120	\$20,000
	Prevention of Significant Deterioration (PSD) Modification not impacting a Class I Area (no Class I modeling required) No BACT limit change but requires Public Notice	120	\$5,000
	Prevention of Significant Deterioration (PSD) Modification not impacting a Class I Area (no Class I modeling required) Number of BACT Pollutants X \$5,000 per BACT modification	120	Total Fee \$ Maximum of \$20,000
	Prevention of Significant Deterioration (PSD) impacting a Class I Area (Class I modeling required)	150	\$25,000
	Prevention of Significant Deterioration (PSD) Modification impacting a Class I Area (Class I modeling required) No BACT limit change but requires Public Notice	150	\$5,000
	Prevention of Significant Deterioration (PSD) Modification impacting a Class I Area (Class I modeling required) Number of BACT Pollutants X \$5,000 per BACT modification	150	Total Fee \$ Maximum of \$25,000
	Concrete Minor Source Construction Permit Relocation Request	10	\$1,500
	Asphalt Synthetic Minor Construction Permit Relocation Request	15	\$3,500



Bureau of Air Quality Expedited Review Request Instructions Construction Permits Page 2 of 2

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*All days above are calendar days, but exclude State holidays, and building closure dates due to severe weather or other emergencies. Expedited days for asphalt and concrete also exclude weekends.

**DO NOT SEND PAYMENT UNTIL THE APPLICATION HAS BEEN ACCEPTED INTO THE EXPEDITED PROGRAM. If chosen for expedited review you will be notified by phone for verbal acceptance into the program. Fees must be paid within five business days of acceptance.

PRIMARY AIR PERMIT CONTACT SIGNATURE

I have read the most recent version of the Expedited Review Program Standard Operating Procedures and accept all of the terms and conditions within. I understand that it is my responsibility to ensure an application of the highest quality is submitted in a timely manner, and to address any requests for additional information by the deadline specified. I understand that submittal of this request form is not a guarantee that expedited review will be granted.

Signature of Primary Air Permit Contact	Date



Bureau of Air Quality Construction Permit Application Facility Information Page 1 of 3

FACILITY IDENTIFICATION				
SC Air Permit Number (8-digits only) (Leave blank if one has never been assigned)	Application Date			
2440 - 0005	April 5, 2021			
Facility Name (This should be the name used to identify the facility at the physical address listed below) New-Indy Catawba LLC	Facility Federal Tax Identification Number (Established by the U.S. Internal Revenue Service to identify a business entity) 83-1904423			

FACILITY PHYSICAL ADDRESS					
Physical Address: 5300 Cureton Ferry F	County: York				
City: Catawba State: SC		Zip Code: 29704			
Facility Coordinates (Facility coordinates sho	uld be based at the front door or main entrance o	f the facility.)			
Latitude: 34°50′37″N Longitude: 80°53′25″W NAD27 (North American Datum of 192 NAD83 (North American Datum of 193 NAD83 (North American Datum of 193					

CO-LOCATION DETERMINATION
Are there other facilities in close proximity that could be considered co-located? 🛛 No 🗌 Yes*
List potential co-located facilities, including air permit numbers if applicable:

^{*}If yes, please submit co-location applicability determination details in an attachment to this application.

COMMUNITY OUTREACH

What are the potential air issues and community concerns? Please provide a brief description of potential air issues and community concerns about the entire facility and/or specific project. Include how these issues and concerns are being addressed, if the community has been informed of the proposed construction project, and if so, how they have been informed.

No issues or concerns related to removing the obsolete legacy production limit. Other community concerns regarding odor complaints are being addressed with regulatory agencies and the communities.

FACILITY'S PRODUCTS / SERVICES				
Primary Products / Services (List the primary product and/or service)				
Linerboard/Pulp Manufacturing				
Primary SIC Code (Standard Industrial Classification Codes)	Primary NAICS Code (North American Industry Classification System)			
2631	322130			
Other Products / Services (List any other products and/or services)				
Other SIC Code(s): 2611, 2621	Other NAICS Code(s): 322110, 322121			



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AIR PERMI	T FACILITY CONTACT				
(Person at the facility who can answer tech					
Title/Position: Environmental Manager Salutation: M	lr. First Name: Dan	Last Name: Mallett			
Mailing Address: PO Box 7					
City: Catawba	State: SC	Zip Code: 29704			
E-mail Address: dan.mallett@new-indycb.com	Phone No.: (803) 981-80)10 Cell No.:			
The signed permit will be e-ma					
If additional individuals need copies of the pe					
Name	E-n	nail Address			
Steven Moore	steven.moore@all4inc.c	om			
	L INFORMATION / DATA				
Does this application contain <u>confidential informatio</u> *If yes, include a sanitized version of the application for public review		IAL INFORMATION SHOULD BE SUBMITTED			
"ij yes, include a saniazea version oj the application jor public review	and ONLY ONE COPY OF CONFIDENT	IAL INFORMATION SHOULD BE SUBMITTED			
LIST OF	FORMS INCLUDED				
(Identify all forms in	cluded in the application package)				
Form Name	Inc	cluded (Y/N)			
Expedited Review Request (DHEC Form 2212)	Xes No				
Equipment/Processes (DHEC Form 2567)	Xes	∑ Yes			
Emissions (DHEC Form 2569)					
Regulatory Review (DHEC Form 2570)	⊠ Yes				
Emissions Point Information (DHEC Form 2573)	Yes No (If No, Ex	Xes No (If No, Explain)			
· · · · · · · · · · · · · · · · · · ·	R OR OPERATOR				
Title/Position: Technical Manager Salutation: M	Ir. First Name: Charles	Last Name: Cleveland			
Mailing Address: PO Box 7					
City: Catawba	State: SC	Zip Code: 29704			
E-mail Address: pete.cleveland@new-indycb.com	Phone No.: 803-981-820	06 Cell No.:			
	OPERATOR SIGNATURE				
I certify, to the best of my knowledge and belief, that	* *	_			
or violated. I certify that any application form, report,	•				
is true, accurate, and complete based on information					
any statements and/or descriptions, which are found	d to be incorrect, may result ir	the immediate revocation of any			
permit issued for this application.					
Circulture of Owners on One state		Data			
Signature of Owner or Operator		Date			



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	PROFESSIONAL ENG	INEER INFORMATION	
Consulting Firm Name: ALL4			
Title/Position: PE	Salutation: Ms.	First Name: Amy	Last Name: Marshall
Mailing Address: 630 Davis Dri	ve, Suite 220	***	
City: Durham		State: NC	Zip Code: 27560
E-mail Address: amarshall@all	4inc.com	Phone No.: (984) 777-3073	Cell No.:
SC License/Registration No.: 2	2147		
	DDOEESSTONAL EN	CINEED SIGNATURE	

I have placed my signature and seal on the engineering documents submitted, signifying that I have reviewed this construction permit application as it pertains to the requirements of *South Carolina Regulation 61-62*, *Air Pollution Control Regulations and Standards*.

And Anna

M. MARSHALIN

Signature of Professional

Date



Bureau of Air Quality Construction Permit Application Equipment / Processes Page 1 of 2

APPLICATION IDENTIFICATION						
(Please ensure that the information list in this table is the same on all of the forms and required information submitted in this construction permit application package.)						
Facility Name	SC Air Permit Number (8-digits only)	Application Date				
(This should be the name used to identify the facility)	(Leave blank if one has never been assigned)					
New-Indy Catawba LLC	2440 - 0005	April 5, 2021				

	PROJECT DESCRIPTION
E	Brief Project Description (What, why, how, etc.): Remove obsolete legacy kraft pulp production limit.

	ATTACHMENTS	
Process Flow Diagram	Location in Application: See June 2019 Application and April 2020 Addendum	
Detailed Project Description	Location in Application: See June 2019 Application and April 2020 Addendum	

	EQUIPMENT / PROCESS INFORMATION							
Equipment ID Process ID	Action	Equipment / Process Description	Maximum Design Capacity (Units)	Control Device ID(s)	Pollutants Controlled (Include CAS#)	Capture System Efficiency and Description	Emission Point ID(s)	
5210 - 5255	☐ Add ☐ Remove ☐ Modify ☑ Other	Kraft Pulp Mill (Continuous Digester System, Turpentine Recovery System, Pulp Washing System, Pulp Refining and Washing)	(b) (4)	5260, 5260C, 5270, 2605, 3705	VOC, HAPs, TRS	LVHC Collection System, LVHC System Caustic Scrubber, HVLC Collection System	2610S1, 2610S2	
	Add Remove Modify Other							
	Add Remove Modify Other							



Bureau of Air Quality Construction Permit Application Equipment / Processes Page 2 of 2

		CON	TROL DEVICE IN	IFORMATION			
Control Device ID	Action	Control Device Description	Maximum Design Capacity (Units)	Inherent/Required/Voluntary (Explain)	Destruction/Removal Efficiency Determination		
5260, 5260C, 5270, 2605, 3705	☐ Add ☐ Remove ☐ Modify ☑ Other	Se	See June 2019 Application and April 2020 Addendum				
	Add Remove Modify Other						
	Add Remove Modify Other						

RAW MATERIAL AND PRODUCT INFORMATION					
Equipment ID Process ID Control Device ID	Raw Material(s)	Product(s)	Fuels Combusted		
5210-5255 Wood, cooking liquor		Unbleached pulp	none		

MONITORING AND REPORTING INFORMATION						
Equipment ID Process ID Control Device ID	Pollutant(s)/Parameter(s) Monitored	Monitoring Frequency	Reporting Frequency	Monitoring/Reporting Basis	Averaging Period(s)	
5210-5255	See June 2019 Application and April 2020 Addendum					



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APPLICATION IDENTIFICATION							
(Please ensure that the information list in this table is the same on all of the forms and required information submitted in this construction permit application package.)							
	SC Air Permit Number (8-digits only) (Leave blank if one has never been assigned)	Application Date					
New-Indy Catawba LLC	2440 - 0005	April 5, 2021					

ATTACHMENTS (Check all the appropriate checkboxes if included as an attachment)				
Sample Calculations, Emission Factors Used, etc.	Detailed Explanation of Assumptions, Bottlenecks, etc.			
See June 2019 and April 2020 Permit Applications	See June 2019 and April 2020 Permit Applications			
Supporting Information: Manufacturer's Data, etc.	Source Test Information			
See June 2019 and April 2020 Permit Applications	See June 2019 and April 2020 Permit Applications			
Details on Limits Being Taken for PTE Emissions	NSR Analysis			
See project description for discussion of removing obsolete legacy production	See project description for discussion of removing obsolete legacy production			
limit.	limit.			

SUMMARY OF PROJECTED CHANGE IN FACILITY WIDE POTENTIAL EMISSIONS								
(Calculated at maximum design capacity.)								
	Emiss	ion Rates Prior	rto	Emission Rates After				
Pollutants	Construction	/ Modification	(tons/year)	Construction	/ Modification	(tons/year)		
	Uncontrolled	Controlled	PTE	Uncontrolled	Controlled	PTE		
Particulate Matter (PM)								
Particulate Matter <10 Microns (PM ₁₀)								
Particulate Matter <2.5 Microns (PM _{2.5})								
Sulfur Dioxide (SO ₂)]							
Nitrogen Oxides (NO _x)		Soo Juno	2010 and April	2020 Permit Appl	lications			
Carbon Monoxide (CO)		See Julie	2019 and April	2020 Permit App	ications			
Volatile Organic Compounds (VOC)								
Lead (Pb)								
Highest HAP Prior to Construction (CAS #: 67561)								
Highest HAP After Construction (CAS #: 67561)]							



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SUMMARY OF PROJECTED CHANGE IN FACILITY WIDE POTENTIAL EMISSIONS											
(Calculated at maximum design capacity.)											
	Emiss	ion Rates Prio	rto	Emission Rates After							
Pollutants	Construction	/ Modification	(tons/year)	Construction	/ Modification	ı (tons/year)					
Uncontrolled Controlled PTE Uncontrolled Controlled											
Total HAP Emissions*		_	_		_						

Include emissions from exempt equipment and emission increases from process changes that were exempt from construction permits.

(*All HAP emitted from the various equipment or processes must be listed in the appropriate "Potential Emission Rates at Maximum Design Capacity" Table)

	POTENTIAL EMISSION RATES AT MAXIMUM DESIGN CAPACITY											
Equipment ID /	Equipment ID / Emission Pollutants Calculation Methods / Limits Taken / Uncontrolled Controlled PTE											
Process ID	Point ID	(Include CAS #)	Other Comments	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr			
5210-5255	ALL	ALL	See June 2019 and April 2020 Permit Applications									



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APPLICATION IDENTIFICATION										
(Please ensure that the information list in this table is the same on all of the forms and required informa	tion submitted in this construction permit applicatio	n package.)								
Facility Name	SC Air Permit Number (8-digits only)	Application Date								
(This should be the name used to identify the facility)	(Leave blank if one has never been assigned)									
New-Indy Catawba LLC	2440 - 0005	April 5, 2021								

STAT	STATE AND FEDERAL AIR POLLUTION CONTROL REGULATIONS AND STANDARDS (If not listed below add any additional regulations that are triggered.)										
	Appli	cable		Include all limits, work practices, monitoring, record keeping, etc.							
Regulation	Yes	Yes No Explain Applicability Applicability Determination List the specific limitations and/or requirements that apply.									
Regulation 61-62.1, Section II(E) Synthetic Minor Construction Permits			See June 2019 Ap	pplication and April 2020 Addendur	m						
Regulation 61-62.1, Section II(G) Conditional Major Operating Permits			See June 2019 Ap	pplication and April 2020 Addendur	m						
Regulation 61-62.5, Standard No. 1 Emissions from Fuel Burning Operations		See June 2019 Application and April 2020 Addendum									
Regulation 61-62.5, Standard No. 2 Ambient Air Quality Standards			See June 2019 Ap	pplication and April 2020 Addendur	n						
Regulation 61-62.5, Standard No. 3 Waste Combustion and Reduction			See June 2019 Ap	pplication and April 2020 Addendur	m						
Regulation 61-62.5, Standard No. 4 Emissions from Process Industries			See June 2019 Ap	pplication and April 2020 Addendur	m						
Regulation 61-62.5, Standard No. 5 Volatile Organic Compounds			See June 2019 Ap	pplication and April 2020 Addendur	n						
Regulation 61-62.5, Standard No. 5.2 Control of Oxides of Nitrogen	See June 2019 Application and April 2020 Addendum										
Regulation 61-62.5, Standard No. 7 Prevention of Significant Deterioration*	See June 2019 Application and April 2020 Addendum										
Regulation 61-62.5, Standard No. 7.1 Nonattainment New Source Review*			See June 2019 Ap	pplication and April 2020 Addendur	n						



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STAT	E AND F		L AIR POLLUTION CONTROL REC							
	Appli	cable		work practices, monitoring, re-	cord keeping, etc.					
Regulation	Yes	Yes No Explain Applicability Determination Explain Applicability and/or requirements that apply. How will contain the specific limitations and/or requirements that apply.								
Regulation 61-62.5, Standard No. 8 Toxic Air Pollutants			See June 2019 Ap	oplication and April 2020 Addendu	m					
Regulation 61-62.6 Control of Fugitive Particulate Matter			See June 2019 Ap	oplication and April 2020 Addendu	m					
Regulation 61-62.68 Chemical Accident Prevention Provisions			See June 2019 Ap	oplication and April 2020 Addendu	m					
Regulation 61-62.70 Title V Operating Permit Program		See June 2019 Application and April 2020 Addendum								
40 CFR Part 64 - Compliance Assurance Monitoring (CAM)			See June 2019 Ap	pplication and April 2020 Addendu	m					
40 CFR 60 Subpart A - General Provisions			See June 2019 Ap	pplication and April 2020 Addendu	m					
40 CFR 60 Subpart BB/BBa – Kraft Pulp Mill NSPS			See June 2019 Ap	pplication and April 2020 Addendu	m					
40 CFR 61 Subpart A - General Provisions			See June 2019 Ap	pplication and April 2020 Addendu	m					
40 CFR 63 Subpart A - General Provisions			See June 2019 Ap	pplication and April 2020 Addendu	m					
40 CFR 63 Subpart S – Pulp and Paper MACT		See June 2019 Application and April 2020 Addendum								
Construction Permit DC – Condition 6.B.2			Obsolete legacy kraft pulp production limit no longer applies							
TV-2440-0005 – Condition C.14		Obsolete legacy kraft pulp production limit no longer applies								

^{*} Green House Gas emissions must be quantified if these regulations are triggered.



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	A. APPLICATIO	N IDENTIFICATION	
1. Facility Name: New-Indy Catawba LLC			
2. SC Air Permit Number (if known; 8-digits only): 2440) - 0005	3. Application Date: April 5, 2021	
4. Project Description: Remove obsolete legacy kraft բ	ulp production limit.		
	B. FACILITY	INFORMATION	
1. Is your company a Small Business? Yes No		2. If a Small Business or small gorequested? ☐ Yes ☑ No	vernment facility, is Bureau assistance being
3. Are other facilities collocated for air compliance?	☐ Yes 🔀 No	4. If Yes, provide permit numbers	s of collocated facilities:
	C. AIR	CONTACT	
Consulting Firm Name (if applicable):			
Title/Position: Environmental Manager	Salutation: Mr.	First Name: Daniel	Last Name: Mallett
Mailing Address: P.O. Box 7			
City: Catawba		State: SC	Zip Code: 29704
E-mail Address: dan.mallett@new-indycb.com		Phone No.: (803) 981-8010	Cell No.:

D. EMISSION POINT DISPERSION PARAMETERS

Source data requirements are based on the appropriate source classification. Each emission point is classified as a point, area, volume, or flare source. Contact the Bureau of Air Quality for clarification of data requirements. Include sources on a scaled site map. Also, a picture of area or volume sources would be helpful but is not required. A user generated document or spreadsheet may be substituted in lieu of this form provided all of the required emission point parameters are submitted in the same order, units, etc. as presented in these tables.

Abbreviations / Units of Measure: UTM = Universal Transverse Mercator; °N = Degrees North; °W = Degrees West; m = meters; AGL = Above Ground Level; ft = feet; ft/s = feet per second; ° = Degrees; °F = Degrees Fahrenheit



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	E. POINT SOURCE DATA (Point sources such as stacks, chimneys, exhaust fans, and vents.)														
	Point Source Coordinates Projection:				tes	Release			Inside		Rain	Distance To Nearest	Building		
Emission Point ID	Description/Name	UTM E (m)	UTM N (m)	Lat (°N)	Long (°W)	Height AGL (ft)	Temp. (°F)	Exit Velocity (ft/s)	Diamete r (ft)	Discharge Orientati on	Cap? (Y/N)	Nearest Property Boundary (ft)	Height (ft)	Length (ft)	Width (ft)
ALL	See June 2019 and April 2020 Permit Applications														

	F. AREA SOURCE DATA												
	(Area sources such as storage piles, and other sources that have low level or ground level releases with no plumes.)												
Emission	Area Source Coordinates Emission Projection:						Easterly Length	Northerly Length	Angle From North	Distance To Nearest Property Boundary			
Point ID	Description/Name	UTM E				AGL (ft)	(ft)	(ft)	(°)	(ft)			

	G. VOLUME SOURCE DATA												
	(Volume sources such as building fugitives that have initial dispersion vertical depth prior to release.)												
Emission	Volume Source Coordinates Projection:					Release Height AGL	Initial Horizontal Dimension	Initial Vertical Dimension	Distance To Nearest Property Boundary				
Point ID	Description/Name	UTM E UTM N Lat Long (m) (m) (°N) (°W)				(ft)	(ft)	(ft)	(ft)				
									·				



Bureau of Air Quality Emission Point Information Page 6 of 5

	H. FLARE SOURCE DATA (Point sources where the combustion takes place at the tip of the stack.)												
Emission	Flare Source Coordinates					Release Height	Heat Release Rate	Distance To Nearest Property Boundary	Building				
Point ID	Description// dame	UTM E UTM N Lat Long (m) (m) (°N) (°W)		AGL (ft)	(BTU/hr)	(ft)	Height (ft)	Length (ft)	Width (ft)				

	I. AREA CIRCULAR SOURCE DATA												
Emission	Area Circular Source Coordinates Sion Projection:				Projection: Release Height		Radius of Area	Distance To Nearest					
Point ID	Description/Name	UTM E		_	AGL (ft)	(ft)	Property Boundary (ft)						

	J. AREA POLY SOURCE DATA												
Emission	Description/None	Area Poly Sourc Projectio		Release Height	Number of Vertices								
Point ID	Description/Name	UTM E UTM N (m) (m)		AGL (ft)	Number of Vertices								

K. OPEN PIT SOURCE DATA									
Emission Point ID	Description/Name	Description/Name Open Pit Source Coordinates Projection: UTM E UTM N (m) (m)		Release Height		Northerly Length (ft) Volume (ft³)		Angle From North (°)	



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K. OPEN PIT SOURCE DATA									
Emission Point ID	Description/Name	Open Pit Source Coordinates Projection:		Release Height	Easterly Length	Northerly	Volume	Angle From North (0)	
		UTM E (m)	UTM N (m)	AGL (ft)	(ft)	Length (ft)	(ft³)	Angle From North (°)	



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L. EMISSION RATES									
Emission	Pollutant Name	CAS#	Emission Rate	Same as	Controlled or	Averaging			
Point ID	Pollutalit Name	CAS#	(lb/hr)	Permitted (1)	Uncontrolled	Period			
ALL	See June 2019 and April 2020 Permit Applications								
				Yes No					
				Yes No					

⁽¹⁾ Any difference between the rates used for permitting and the air compliance demonstration must be explained in the application report.